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1 2 3 4 5	HOFFMAN & LAZEAR H. TIM HOFFMAN (049141) (hth@hoffmanan ARTHUR W. LAZEAR (083603) (awl@hoffma CHAD A. SAUNDERS (257810) (cas@hoffma 180 Grand Avenue, Suite 1550 Oakland, California 94612 Telephone: (510) 763-5700 Facsimile: (510) 835-1311 Attorneys for Plaintiff GALINA SEEBROOK	anandlazear.com)	
6	UALINA SEEDROOK		
7 8 9	COOLEY LLP MICHELLE C. DOOLIN (179445) (doolinmc@ LEO P. NORTON (216282) (lnorton@cooley.co DARCIE A. TILLY (239715) (dtilly@cooley.co 4401 Eastgate Mall	om)	
10 11	San Diego, CA 92121 Telephone: (858) 550-6000 Facsimile: (858) 550-6420		
12	Attorneys for Defendant		
13	STRIDĖ RITE CHILDREN'S GROUP, LLC		
14			
15	UNITED STATES DISTRICT COURT		
16	NORTHERN DISTR	ICT OF CALIFORNIA	
17			
18	GALINA SEEBROOK, individually and on behalf of all others similarly situated,	Case No. C11-00835-SC	
19	Plaintiff,	STIPULATION AND [P ROPOSED] ORDER TO STRIKE CERTAIN	
20	v.	ALLEGATIONS IN COMPLAINT	
21	STRIDE RITE CHILDREN'S GROUP, LLC,		
22	a Massachusetts limited liability company,		
23	Defendant.		
24	After meeting and conferring regarding (i) allegations relating to injunctive relief		
25	(ii) allegations relating to "damages," and (iii) the jury demand asserted in the complaint, plaintiff		
26	Galina Seebrook ("Plaintiff") and defendant Stride Rite Children's Group, LLC ("Stride Rite")		
27	by and through their respective counsel, hereby stipulate and agree that the following portions of		
28	complaint should be stricken:		
COOLEY LLP ATTORNEYS AT LAW	1	STIP. & [PROPOSED] ORDER TO STRIKE CERTAIN ALLEGATIONS IN COMPLAINT	

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1	 Page 1, line 15 and generally: the words "[JURY TRIAL DEMANDED]" and 	
2	plaintiff's demand for trial by jury generally;	
3	• Page 6, line 8: paragraph 24, subparagraph (d), in its entirety;	
4	• Page 6, line 9: paragraph 24, subparagraph (e), in its entirety; and	
5	• Page 7, lines 18-22: second paragraph in the Prayer for Relief in its entirety.	
6	IT IS SO STIPULATED.	
7		FFMAN & LAZEAR
8	ART	TM HOFFMAN (049141) THUR W. LAZEAR (083603)
9	CHA	AD A. SAUNDERS (257810)
10		thad A. Saunders
11		d A. Saunders (257810) ail: cas@hoffmanandlazear.com
12	Atto	rneys for Plaintiff LINA SEEBROOK
13	UAL	ENVA SLEDROOK
14		OLEY LLP CHELLE C. DOOLIN (179445)
15	LEC	P. NORTON (216282) RCIE A. TILLY (239715)
16		
17		eo P. Norton P. Norton (216282)
18	E-ma	ail: lnorton@cooley.com
19	Atto STR	rneys for Defendant IDE RITE CHILDREN'S GROUP, LLC
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21 22		
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COOLEY LLP ATTORNEYS AT LAW SAN DIEGO	2.	STIP. & [PROPOSED] ORDER TO STRIKE CERTAIN ALLEGATIONS IN COMPLAINT CASE NO. C11-00835-SC

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COOLEY LLP ATTORNEYS AT LAW SAN DIEGO

[PROPOSED] ORDER

Having considered the stipulation filed by plaintiff Galina Seebrook ("Plaintiff") and defendant Stride Rite Children's Group, LLC, the following portions of the complaint shall be stricken:

- Page 1, line 15 and generally: the words "[JURY TRIAL DEMANDED]" and plaintiff's demand for trial by jury generally;
- Page 6, line 8: paragraph 24, subparagraph (d), in its entirety;
- Page 6, line 9: paragraph 24, subparagraph (e), in its entirety; and
- Page 7, lines 18-22: second paragraph in the Prayer for Relief in its entirety.

3.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: ____April 19, 2011



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1	FILER'S ATTESTATION		
2	Pursuant to General Order No. 45, Section X, Subparagraph B, the undersigned attests tha		
3	all parties have concurred in the filing of this Stipulation and [Proposed] Order to Strike Certain		
4	Allegations in Complaint.		
5	Detail: Amiil 14 2011 COOLEVIID		
6	Dated: April 14, 2011 COOLEY LLP MICHELLE C. DOOLIN (179445) LEO P. NORTON (216282)		
7	LEO P. NORTON (216282) DARCIE A. TILLY (239715)		
8	/s/ Leo P. Norton		
9	Leo P. Norton Leo P. Norton (216282) E-mail: lnorton@cooley.com		
10	Attorneys for Defendant STRIDE RITE CHILDREN'S GROUP, LLC		
11	STRIDE RITE CHILDREN'S GROUP, LLC 708424/SD		
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4.747	STIP. & [PROPOSED] ORDER TO STRIKE		

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